Keller W. Allen, WSBA No. 18794 ALLEN & McLANE, P.C. The Paulsen Center, Suite 421 421 W. Riverside Avenue Spokane, WA 99201 Telephone: (509) 777-2211

Facsimile: (509) 777-2215

Attorneys for Defendant GOODRICH COPORATION, INC.

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON

ROY REISEN, a single person,

Plaintiff,

VS.

GOODRICH CORPORATION, INC., a New York Corporation,

Defendant.

Case No. CV-07-294-FVS

STIPULATED PROTECTIVE ORDER

It is hereby stipulated between the Plaintiff and Defendant in the above-captioned matter that the confidentiality provisions described herein shall govern the following information and documents that will

ALLEN & McLANE, P.C. 421 W. Riverside Avenue, Suite 421 Spokane, WA 99201

> Tel: (509) 777-2211 Fax: (509) 777-2215

be provided in depositions and in response to discovery requests in

this matter:

1. Any documents, information and testimony produced by a

party in this action which are, in good faith, determined by the

producing party to contain confidential or proprietary information,

including without limitation documents and information pertaining to

personnel and related files maintained by Defendant, provided it is

marked or designated "Confidential".

The parties request that the Court enter an order consistent with

this stipulation as follows:

2. Information, documents and testimony covered by this

protective order shall not be used for any purpose except in

connection with this pending action, and shall not be delivered,

exhibited or disclosed to any person, except to: a) The parties to this

litigation; b) Employees of counsel assisting said counsel in the

preparation and trial of this matter; and c) Experts or other witnesses

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with whom Plaintiff or Defendant consult in preparation for this litigation, as provided in paragraph 3.

- 3. Before delivery or disclosure of any information, document or testimony covered by this protective order to any expert or other witness as described in the foregoing paragraph, such persons shall be required to read a copy of this protective order and to sign a statement, in the form of Attachment A hereto, indicating that the person has read and shall abide by this order.
- 4. Nothing in this protective order shall prevent the use of covered material at time of hearing; on motion, including summary judgment; or in any discovery hearing. Nothing in this protective order shall be considered a waiver of any objection, or response to objection, regarding admissibility or use of covered material. If information, documents and testimony covered by the protective order are used in or in support of motions or briefs, the fact that the information, documents or testimony exist may be referred to, but the confidential information, documents or testimony shall be filed under seal. Any confidential information filed under seal pursuant to

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421 W. Riverside Avenue, Suite 421
Spokane, WA 99201

Tel: (509) 777-2211 Fax: (509) 777-2215 this order shall state "Sealed Pursuant to Protective Order" in the

heading. Should either party fail to file confidential information under

seal, they may be removed from any public file and filed under seal

upon the request of either party to the Court.

5. The terms of this protective order may be modified by

written stipulation of the parties or the order of the Court. Either party

may apply to the Court for modification or interpretation of this order by

telephonic conference or written motion.

6. All documents, information and testimony, and copies

thereof, covered by this protective order shall be returned to the

producing party upon final conclusion of this proceeding.

Jointly Presented By:

s/ Christine M. Weaver

2/7/08

Christine M. Weaver, WSBA No. 20845

Attorney for Plaintiff

Date

Fax: (509) 777-2215

s/ Keller W. Allen	<u>2/8/08</u>	
Keller W. Allen, WSBA No. 18794	Date	
Attorney for Defendant		

**ORDER** 

IT IS SO ORDERED.

DATED this 6th day of March, 2008.

s/ Fred Van SickleFred Van SickleUnited States District Judge

## **ATTACHMENT A**

STATE OF	
COUNTY OF	)
	, being first duly sworn
on oath, deposes and says:	
, in the act	y of the Protective Order dated ion entitled <u>Roy Reisen v. Goodrich</u> the same and shall abide by it.
exhibit or disclose to me any which has been marked or de of the Protective Order, I shalt testimony for any purpose excaction, and I shall not deliver, except with parties to this action.	orneys, or other agent shall deliver, document, information or testimony esignated as confidential under the terms. I not use such document, information or cept in connection with the above-entitled exhibit, or disclose it to any persons on, their counsel of record and such discounsel as are assisting counsel in the on.
SUBSCRIBED AND SW , 2008.	VORN to before me this day of
	Print Name:
	NOTARY PUBLIC in and for the State of, residing at
	My commission expires: